

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

In re Ethicon, Inc. Pelvic Repair System MDL No. 2327
Products Liability Litigation

This Document Relates to All Cases

**APPLICATION OF A. DONALD C. DISCEPOLO, ESO,
FOR APPOINTMENT TO PLAINTIFFS' STEERING COMMITTEE**

A. Donald C. Discepolo, of the Law Firm, Discepolo LLP submits this application for Appointment to the Plaintiffs' Steering Committee and states as follows:

Mr. Discepolo is a graduate of the University of Maryland and the Southern New England School of Law. Starting as a sole practitioner, Mr. Discepolo's firm has grown to include ten other attorneys. Mr. Discepolo's firm remains focused primarily on personal injury actions with an emphasis on maintaining close client communication during cases.

Mr. Discepolo has been involved in numerous product liability cases, including both Stryker Hip and DePuy ASR and Pinnacle Hip Replacement products. He also represented numerous plaintiffs in individual cases in the Baltimore area arising out of allegations of wrongful cardiac stent emplacement that occurred at St. Joseph Medical Center. He had been involved in numerous mass tort cases, including: representing 20 individuals who were exposed to a serious carbon monoxide release at a hotel, which culminated in a \$34.3 million verdict after a three month long trial; and 45 individuals in a neighborhood that was subjected to well water contamination, which resulted in a complex remediation plan valued at over \$20 million.

Mr. Discepolo has the willingness and availability to commit both his efforts and the efforts of his firm to this time-consuming project. Although he only began representing vaginal mesh clients within the last few months, Mr. Discepolo and his firm quickly established procedures to efficiently and expeditiously review and analyze a great number of potential claims, and, to date, have filed over 60 separate cases. Six of the cases have already been established as member cases in MDL 2325; Mr. Discepolo also currently has 12 member cases in MDL 2326 and 17 member cases in MDL 2327. It is anticipated that the remainder of Mr. Discepolo's sixty cases will be transferred to one of the vaginal mesh MDLs; in addition, Mr. Discepolo has over 150 vaginal mesh cases that are being reviewed for possible inclusion the MDL's.

Mr. Discepolo has a demonstrated ability to work cooperatively with others. Several mass tort cases have required the coordinating with multiple plaintiffs' attorneys to establish a unified litigation strategy and discovery plan.

Mr. Discepolo's mass tort experience provides a unique perspective in these cases, which would assist and enhance the work of the Plaintiffs' Steering Committee. Furthermore, as shown above, he and his firm have the ability to quickly establish procedures to allow the prompt analysis and prosecution of claims.

/s/A. Donald C. Discepolo
A. Donald C. Discepolo
Maryland Federal Bar No.: 25525
Discepolo LLP
111 S. Calvert Street, Suite 1950
Baltimore, Maryland 21202
Telephone: 410-296-0780
Facsimile: 410-296-2263
Don@discepolollp.com

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/A. Donald C. Discepolo

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Maryland Federal Bar No.: 25525
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